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**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

BRIAN HELLING

Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

Civil Action No.: 24-CV-00111

MOTION FOR PRO HAC VICE OF KATHLEEN WATSON MOSS, ESQ.

Pursuant to Rule 84.2(b), I, Ronald J. Lopez, Bar No. 7-4697, hereby moves for *pro hac vice* admission of Kathleen Watson Moss to practice before this Court in the above-captioned matter as counsel for Defendant Allstate Insurance Company.

AS GROUNDS FOR THIS MOTION, I state the following:

1. I am a member in good standing of the Wyoming State Bar and am admitted to practice in the United States District Court for the District of Wyoming.
2. Ms. Watson Moss practices at the law firm of Benesch Friedlander Coplan & Aronoff, LLP, 71 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606, telephone number of (312) 212-4949, KWatsonMoss@beneschlaw.com. I vouch, to the best of my knowledge, for the good moral character and veracity of Ms. Watson Moss. She is a member in good standing of the Bar in the State of Illinois and the courts listed on Exhibit A of Ms. Watson Moss's Affidavit.

3. To the best of my knowledge, Ms. Watson Moss is in good standing in all Bars wherever admitted and has not been subject to any order of discipline or disability by any Bar or had any request for *pro hac vice* admission denied or revoked.
4. Ms. Watson Moss has not previously sought *pro hac vice* admission in the United States District Court for the District of Wyoming.
5. I, or someone from Bailey Stock Harmon Cottam Lopez LLP, will be present and participate in a meaningful and substantial manner throughout the proceedings and trial of this matter. I will be fully prepared to represent Allstate Insurance Company at any time and in any capacity.
6. An affidavit setting forth Ms. Watson Moss's qualifications and compliance is attached.
7. As set forth in her Affidavit, Ms. Watson Moss will comply with and be bound by the Local Rules of the United States District Court for the District of Wyoming and submits to the disciplinary jurisdiction of the Court for any alleged misconduct arising in the course of preparation and representation in the proceedings.

WHEREFORE, Ronald J. Lopez respectfully requests that the Court admit Kathleen Watson Moss *pro hac vice*, to practice before the Court in this case.

Dated this 12th day of July, 2024.

BAILEY STOCK HARMON COTTAM LOPEZ LLP

/s/ Ronald J. Lopez

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Counsel for Defendant Allstate Insurance Company

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing *Motion for Pro Hac Vice Admission of Kathleen Watson Moss* was served via this court's CM/ECF system this 12th day of July 2024, to the following:

Justin J. Walker
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318 East Pikes Peak Avenue
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/s/ Ronald J. Lopez
Ronald J. Lopez